

Jonathan Corbett, Esq. (CA Bar No. 325608)

958 N. Western Ave. #765

Hollywood, CA 90029

Phone: (310) 684-3870

FAX: (310) 675-7080

E-mail: jon@corbettrights.com

Attorney for Michele Leuthauser

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Michele Leuthauser

Plaintiff

v.

United States of America

- and -

Anita Serrano

Defendants

Case 20-CV-479 (JCM) (VCF)

(Corrected)

**MOTION TO EXTEND TIME TO
FILE DISCOVERY DISPUTE**

(Fourth Request)

The parties have made headway into resolving their discovery issues; however, their good-faith attempts are substantially delayed by the wheels of bureaucracy within TSA. As the Court can see from last Thursday's motion, ECF No. 58, the parties still have not completely resolved their issues regarding the discoverability of Sensitive Security Information. However, the parties have begun the process to clear Plaintiff's counsel to view Sensitive Security Information (which involves a background check by DHS).

It is our hope that this process will go as expeditiously as possible and leave few, if any, matters for the Court to resolve via motion practice. And, despite Plaintiff's goal to advance this litigation quickly, it appears necessary to delay while the agency takes a reasonable amount of time to conduct its background checks.

Plaintiff therefore proposes, and Defendants have indicated they consent, to the following scheduling modification:

<u>Item Due</u>	<u>Current Deadlines</u>	<u>Proposed Deadlines</u>
Motions to Compel	2/12/2021	3/12/2021 (+4 weeks)
Discovery	3/23/2021	4/20/2021 (+4 weeks)
Pre-Trial Motions	4/22/2021	5/20/2021 (+4 weeks)
Prop. Pre-Trial Order	5/21/2021	6/18/2021 (+4 weeks)

This is the fourth request (not counting the stricken request at ECF No. 60 that this document replaces) to extend time regarding this matter (two by Defendants, and now two by Plaintiff).

Dated: Las Vegas, NV

February 18th, 2021

Respectfully submitted,

/s/Jonathan Corbett

Jonathan Corbett, Esq.
 (CA Bar #325608)
Attorney for Michele Leuthauser
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 Hollywood, CA 90029
 Phone: (310) 684-3870
 FAX: (310) 675-7080
 E-mail: jon@corbettrights.com

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE
 Date: 3-8-2021